

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SARA RIVERS,
(formerly known as Sara Stokes)

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY, DIDDY, PUFF, PUFF DADDY, PUFFY, BROTHER LOVE”, BAD BOY ENTERTAINMENT HOLDINGS, INC., HARVE PIERRE, TRACY WAPLES, ALISON STANLEY, CHRIS SAINSBURY, DEVYNE STEPHENS, NORMA AUGENBLICK, DEREK WATKINS (a/k/a FONZORTH BENTLEY), TONY DOFAT, MICKEY CARTER, DERIC ANGELETTIE (a/k/a “D.Dot” and “MADD RAPPER”), JASON WILEY, BAD BOY ENTERTAINMENT LLC, PHIL ROBINSON, SHAWN PEREZ, DADDY’S HOUSE RECORDING STUDIOS, BAD BOY PRODUCTIONS INC., COMBS ENTERPRISES, LLC, UMG RECORDINGS, INC., JANICE COMBS, JANICE COMBS PUBLISHING INC., JANICE COMBS PUBLISHING HOLDINGS INC., SEAN JOHN CLOTHING LLC., PARAMOUNT GLOBAL, VIACOM, MTV PRODUCTIONS, JACKIE FRENCH, LOU PEARLMAN (estate of), BUNIM-MURRAY PRODUCTIONS, TOWNSQUARE MEDIA GROUP, JOHN AND JANE DOES 1-50, and DOE ORGANIZATIONS 1-10

Defendants.

Case No.: 1:25-cv-01726-JSR

NOTICE OF MOTION

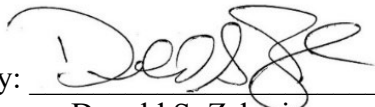
**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law dated June 23, 2025, upon the supporting Declarations of Corinne Hanna and Carla M. Miller and all exhibits thereto, and upon all proceedings had herein, Defendant UMG Recordings, Inc. (“UMGR”) will move this Court, in accordance with Fed. R. Civ. P. 12(b)(6), before the Hon. Jed S. Rakoff, in Courtroom 14B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order dismissing all claims in the Complaint (ECF No. 1) against UMGR with prejudice because all of Plaintiff’s claims are time-barred, improperly group-pled,

and otherwise fail to state any claim against UMGR for reasons stated in UMGR's accompanying memorandum of law. Pursuant to this Court's Orders during teleconferences held on April 28, 2025 and June 6, 2025, Plaintiff's opposition to UMGR's motion to dismiss will be due on July 23, 2025, UMGR's reply in further support of its motion to dismiss will be due on August 6, 2025, and this Court will hear oral argument on the motion on August 13, 2025 at 11:00 a.m.

Dated: New York, New York
June 23, 2025

PRYOR CASHMAN LLP

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